

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT TITLE V PERMIT NO. V-97-008 REVISION 1
FREUDENBERG NONWOVENS LIMITED PARTNERSHIP
2975 PEMBROKE ROAD
HOPKINSVILLE, KENTUCKY, 42240
FEBRUARY 15, 2001
DONALD O. NEWELL, REVIEWER
PLANT I.D. # 21-047-00019
APPLICATION LOG # G 605 (51385)

SOURCE DESCRIPTION:

Freudenberg Nonwovens Limited Partnership (FNLP) operates a nonwoven fabric manufacturing plant in Hopkinsville, Ky. They were issued a source-wide Title V permit in 1997 which expires August 22, 2002.

On November 27, 2000, an application was received (Log # 53366) by the Division for the construction, installation, and operation of a new forming set (identified as the V2 Set) and laminator to manufacture nonwoven textiles for commercial uses. The permit application contains process descriptions, process flow diagrams, and emission calculations for the proposed sources. The application also identified two existing processes (the K72 Fusible Paste Set and the K73 Rotogravure Hot Melt Set) which have been shut down and removed.

Revision 1 to permit V-97-008 is being issued to add the V2 Set and to remove the K72 Set and the K-73 Set. Other changes incorporated in this revision include:

- 1) Addition of several insignificant activities associated with the V2 Set,
- 2) Correction of errors in the original permit in Section B (Emission Points, Affected Facilities, Applicable Regulations, and Operating Conditions) which mistakenly identified formaldehyde sources (no change in emissions resulted), and
- 3) Updating Section F (Monitoring, Record Keeping, and Reporting Requirements) and Section G (General Conditions) to incorporate changes in the permit template.

COMMENTS:

EMISSION INCREASES:

Overall emissions increases (in TPY) for the construction of the new V2 production line, minus the reductions achieved by removal of the K72 Set and the K73 Set are as follows:

TSP	PM ₁₀	SO ₂	NO _x	CO	VOC	NH ₃	HAP
4.29	4.29	0	0	0	0.7	9.33	2.47

NOTE: These figures are included simply to show the relatively minor overall change to total emissions. This permit modification is not subject to PSD.

APPLICABLE REGULATIONS:

The emissions from this facility are subject to the following regulations:

1. Emission Point B1 (Cleaver Brooks Boiler): Regulation 401 KAR 59:015, New indirect fired heat exchangers, applies to the particulate matter and sulfur dioxide emissions from the combustion of natural gas and fuel oil.
2. Emission Point K1 (K1 Forming Set):
 - a. Regulation 401 KAR 59:010, New process operations, applies to the particulate matter emissions.
 - b. Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances, applies to the formaldehyde emissions.
3. Emission Point K2 (K2 Forming Set):
 - a. Regulation 401 KAR 59:010, New process operations, applies to the particulate matter emissions.
 - b. Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances, applies to the formaldehyde emissions.
4. Emission Point K3 (K3 Forming Set):
 - a. Regulation 401 KAR 59:010, New process operations, applies to the particulate matter emissions.
 - b. Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances, applies to the formaldehyde emissions.
5. Emission Point K4 (70 Fusible Set):
 - a. Regulation 401 KAR 59:010, New process operations, applies to the particulate matter emissions.
 - b. Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances, applies to the formaldehyde emissions.
6. Emission Point K5 (K71 Powder Set): Regulation 401 KAR 59:010, New process operations, applies to the particulate matter emissions.
7. Emission Point K8 (Polycarbonate (PC) Set):
 - a. Regulation 401 KAR 59:010, New process operations, applies to the particulate matter emissions.
 - b. Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances, applies to the methylene chloride emissions.
8. Emission Point K9 (V2 Forming Set): Regulation 401 KAR 59:010, New process operations, applies to the particulate matter emissions.
9. Emission Point K10 (Laminator): Regulation 401 KAR 59:010, New process operations, applies to the particulate matter emissions.

EMISSION AND OPERATING CAPS DESCRIPTION:

N/A

PERIODIC MONITORING

See Section B 4., Specific Monitoring Requirements

OPERATIONAL FLEXIBILITY:

N/A

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.